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May 23, 2025

Via ECF

Hon. Andrew L. Carter Jr.
Thurgood Marshall
United States Courthouse
40 Foley Square, Courtroom 444
New York, NY 10007

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Re: **Marciniak-Domingues Goncalves Agra v. Rockefeller University et al., No. 22-cv-10959-ALC**

Dear Judge Carter:

We represent The Rockefeller University (“RU”) and Dr. Winrich Freiwald (“Dr. Freiwald”) (collectively, the “RU Defendants”) in the above-captioned matter. We write in response to Plaintiff Dr. Karolina Marciniak-Domingues Goncalves Agra’s (“Plaintiff”) letter motions requesting¹ (i) six weeks from the filing of the RU Defendants’ motion to dismiss to file an opposition to the RU Defendants’ motion (“Opposition”) (ECF No. 152) and (ii) leave to file up to **45** pages in her Opposition. (ECF No. 153.)

The RU Defendants do not object to Plaintiff’s request to file her Opposition six weeks from the filing of the RU Defendants’ motion to dismiss provided that the RU Defendants have thirty (30) days to file their reply. The RU Defendants believe this briefing schedule is appropriate in light of prearranged travel plans around the 4th of July holiday. The original briefing schedule would have Plaintiff’s Opposition due on or before June 3, 2025 and the RU Defendants’ reply would have been due on or before June 10, 2025. If the requested briefing schedule is granted, Plaintiff’s Opposition will be due on or before July 1, 2025 and the RU Defendants’ reply will be due on or before July 31, 2025. The extension requested on the reply is the first extension the RU Defendants have requested with respect to this briefing.

The RU Defendants oppose Plaintiff’s request for leave to file an Opposition brief that is up to forty-five (45) pages. If Plaintiff’s request is granted, she would be permitted to file a brief that is nearly double the number of pages permitted by Your Honor’s Individual Rules and Practices. *See* Rule 2B.² As set forth in the RU Defendants’ motion to dismiss, Plaintiff’s Third Amended Complaint is already lengthy, rambling and difficult to decipher. While the RU Defendants recognize that Plaintiff is proceeding *pro se*, Plaintiff requested the aforementioned extension within just a couple of hours after the RU Defendants filed their motion to dismiss and therefore

¹ Plaintiff did not meet and confer with the RU Defendants with respect to either request as required by Your Honor’s Individual Rules and Practices, Rule 1D.

² While the Southern District of New York’s Local Rules do not contain an explicit page limit for briefs prepared with a computer, a 45-page brief would certainly exceed the 8,750 words permitted by Local Civil Rule 7.1(c).



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did not attempt to prepare a response within this Court's twenty-five (25) page limit. Should the Court grant Plaintiff's requested extension of the time to file, she will have ample opportunity to conform her response to Your Honor's individual practices, including as to its page limit. Accordingly, the RU Defendants respectfully request that the Court deny Plaintiff's request to file a forty-five (45) page opposition to their motion to dismiss.

We thank the Court for its consideration of this matter.

Sincerely,

/s/ Elise M. Bloom

Elise M. Bloom

(cc: Dr. Marciniak-Domingues Goncalves Agra (via ECF); Mr. Frederico Azevedo (via e-mail))